

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

JPMORGAN CHASE, N.A., successor by)	
merger to Chase Home Finance, LLC, successor) Case No. 1:24-cv-478-WES-LDA	
by merger to Chase Manhattan Mortgage)	
Corporation;) District Judge William E. Smith	
)	
Plaintiff,) Magistrate Judge Lincoln D. Almond	
)	
v.)	
)	
ROBERT G. CARVER, J.R. a/k/a)	
ROBERT G. CARVER, and)	
LINDA A. CARVER;)	
)	
Defendants,)	
)	
UNITED STATES OF AMERICA,)	
JOHN B. ENNIS, and)	
OCEANSIDE PROPERTIES LLC;)	
)	
<u>Defendants/Parties in Interest.</u>)	

**REQUEST FOR ENLARGEMENT OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, the Defendant United States of America (“United States”) requests an enlargement of time of forty-five (45) days from the date of removal, until January 3, 2025. In support of this request,¹ the United States submits the following:

¹ The United States seeks this enlargement of time pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure “before the original time or its extension expires.” That Rule provides that an enlargement may be sought under such circumstances “with or without motion,” *i.e.*, by a timely “request.” In contrast, an enlargement sought “after the time has expired” may, under Rule 6(b)(1)(B) of the Federal Rules of Civil Procedure, be sought only “on motion.”

1. Plaintiff JPMorgan Chase Bank, N.A. (“Plaintiff”) commenced the above-captioned interpleader complaint in the State of Superior Court in Washington County, Rhode Island, on October 11, 2024.

2. Plaintiff served the United States Attorney’s Office for the District of Rhode Island with the summons and complaint on October 25, 2024.

3. The United States removed this case to the U.S. District Court for the District of Rhode Island on November 18, 2024. *See* ECF No. 1.

4. Under Rule 81(c) of the Federal Rules of Civil Procedure, the United States has seven (7) days in which to answer or otherwise plead after the date a case is removed, or twenty-one (21) days after receipt of the initial pleadings, whichever is longer.

5. Under Rule 12(a) of the Federal Rules of Civil Procedure, the United States as a defendant ordinarily has sixty (60) days after the service of the complaint upon the United States in which to answer, such time being necessary to obtain information from the appropriate federal agency, in order to prepare an answer or otherwise plead.

6. The United States is working with the Internal Revenue Service to investigate the facts of this case and it needs additional time to receive information from the IRS to prepare an appropriate answer or other pleading, as well as to evaluate the viability of any additional claims.

7. This request is timely because it was made within 7 days of properly removing the case from the State of Rhode Island Superior Court for Washington County, Rhode Island.

8. Plaintiff does not object to the United States’ request for additional time.

WHEREFORE, the United States of America requests that this Court grant an
enlargement of time of forty-five (45) days from the date of removal, until January 3, 2025.

Respectfully Submitted,

DAVID A. HUBBERT
Deputy Assistant Attorney General
U.S. Department of Justice Tax Division

/s/ Daniel M. Caves
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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2024, I filed the foregoing document with the Clerk of the Court through the Court's CM/ECF system, which will electronically serve all registered participants. I also hereby certify that I sent the foregoing document by U.S. Mail to the following non-CM/ECF users:

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